

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

===== :
UNITED STATES OF AMERICA, :
: NOTICE OF MOTION IN LIMINE
:
: 13 cr 242 (SAS)
— *versus* — :
:
:
:
:
:
Jonathan Sambula :
Defendant. :
===== :

PLEASE TAKE NOTICE, that upon the annexed declaration of Stewart L. Orden and upon all the prior proceedings had herein, the defendant will move this Court before the Honorable Shira A. Scheindlin, on July 7, 2014 at 9:30 A.M. in courtroom 15 C at the United States Courthouse, 500 Pearl Street, New York, N.Y. or as soon as counsel can be heard, for the entry of an order *in limine*: (1) precluding the government from introducing evidence of other crimes, wrongs or acts allegedly committed by the defendant pursuant to Fed. R. Crim. P. §§ 403, 404(b); (2) precluding the government from impeaching the defendant on the witness stand by introducing evidence of prior conduct by inquiry or extrinsic means pursuant to Fed. R. Crim. P. §§ 403, 608(b); (3) precluding the government from impeaching the defendant on the witness stand by introducing evidence of prior convictions by inquiry or extrinsic means pursuant to Fed. R. Crim. P. §§ 403, 609, on the grounds that the probative value of such evidence is substantially outweighed by the danger of unfair prejudice and granting the defendant such other, different and further relief as is just and proper.

Dated: New York, New York
June 19, 2014

Yours, etc.

Stewart L. Orden
Attorney for the defendant
2 Westchester Park Drive Suite 418
White Plains, NY 10604
SLO 3700
(914) 393-9450

Service via e-mail and via Clerk's Notice of Electronic Filing upon the following attorneys, who are Filing Users in this case:

Jared Lenow, Jessica Ortiz
Assistant United States Attorneys
1 St. Andrews Plaza
New York, NY 10007